EASTERN	DISTRICT COURT DISTRICT OF MISSOURI HEASTERN DIVISION	FILED
UNITED STATES OF AMERICA,  Plaintiff,	) ) ) )	JUN 02 2020 U.S. DISTRICT COURT
VS.	) No. 1:20CR0008	32 SRC/ACL
RANDY JO HUBBARD II,	) Title 18 U.S.C. §922(g)(1) ) Title 21 U.S.C. §841(a)(1) ) Title 18 U.S.C. §924(c)(1)(A)	
Defendant.	)	

### **INDICTMENT**

# **COUNT I**

THE GRAND JURY CHARGES THAT:

On or about March 22, 2020, in Ripley County, within the Southeastern Division of the Eastern District of Missouri, the defendant,

# RANDY JO HUBBARD II,

knowingly possessed a firearm, while knowing he had previously been convicted in a court of law of one or more crimes punishable by a term of imprisonment exceeding one year, and the firearm previously traveled in interstate or foreign commerce during or prior to being in defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1).

# **COUNT II**

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 22, 2020, in Ripley County, within the Southeastern Division of the Eastern District of Missouri, the defendant,

### RANDY JO HUBBARD II,

knowingly possessed ammunition, while knowing he had previously been convicted in a court of law of one or more crimes punishable by a term of imprisonment exceeding one year, and the ammunition previously traveled in interstate or foreign commerce during or prior to being in defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1).

#### **COUNT III**

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 22, 2020, in Ripley County, within the Southeastern Division of the Eastern District of Missouri, the defendant,

#### RANDY JO HUBBARD II,

did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and punishable under Title 21, United States Code, Section 841(b)(1)(C).

#### **COUNT IV**

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 22, 2020, in Ripley County, within the Southeastern Division of the Eastern District of Missouri, the defendant,

#### RANDY JO HUBBARD II,

did knowingly possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with the intent to distribute methamphetamine as charged in Count III of this Indictment, in violation of Title 18, United

States Code, Section 924(c)(1)(A), and punishable under Title 18, United States Code, Section 924(c)(1)(A)(i).

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN UNITED STATES ATTORNEY

PAUL W. HAHN, #33190MO ASSISTANT UNITED STATES ATTORNEY